

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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In re:	:	Chapter 11
	:	
DEEP MARINE HOLDINGS, INC., <u>et al.</u>	:	Case No. 09-39313
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**APPLICATION OF GREENBERG TRAURIG, LLP FOR ALLOWANCE OF
SUBSTANTIAL CONTRIBUTION CLAIM PURSUANT TO
11 U.S.C. §§ 503(b)(1)(A) AND 503(b)(3)(D) AND FED. R. BANKR. P. 2016**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE (21) DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Greenberg Traurig, LLP ("GT"), a creditor in the chapter 11 cases (the "Cases") of the above-captioned debtors and debtors in possession (collectively, the "Debtors"), respectfully submits this application (the "Application") for entry of an Order, pursuant to sections 503(b)(1) and (b)(3) of title 11 of the United States Code, §§ 101 - 1532 (as amended, the "Bankruptcy Code") and rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for allowance of compensation for professional services rendered and for reimbursement of allowable expenses incurred in the Cases. In support of its Application, GT respectfully represents as follows:

I.
JURISDICTION AND VENUE

1. This Court has jurisdiction over the Cases and this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue of these proceedings and this Application is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are sections 503(b)(1)(A) and 503(b)(3)(D) of the Bankruptcy Code and Bankruptcy Rule 2016.

II.
BACKGROUND

2. Prior to the inception of the Cases, the Debtors created a committee (the “Special Litigation Committee”) to investigate, among other things, allegations of improper conduct by the Debtors raised in a shareholder demand letter dated October 10, 2009 (the “Demand Letter”), the Delaware Litigation (as defined below) and other related litigation filed in Texas (the “Texas Litigation”). The Special Litigation Committee engaged GT to assist with the investigation.

3. After conducting an investigation, GT was asked by the Special Litigation Committee to represent it in the Delaware Litigation and Texas Litigation. The Delaware Litigation was still pending and active at the Petition Date (defined below).

4. On December 4, 2009 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”). The Debtors continue to operate their businesses and manage their properties pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On December 18, 2009, an official committee of unsecured creditors was appointed in the Cases. No trustees or examiners have been appointed in the Cases.

6. On January 19, 2009, the Debtors filed *Debtors' Expedited Application To Approve Retention Of Greenberg Traurig LLP As Special Counsel To The Debtors* (the "Retention Application") [Docket No. 137]. Attached to the Retention Application as Exhibit B was the engagement letter, dated as of January 19, 2009, between GT and the Debtors (the "Engagement Letter"). Pursuant to the Retention Application and the Engagement Letter, the Debtors sought to retain GT as special counsel to represent the interests of the Debtors and provide analysis, research, consultation, legal representation, prosecution and defense as necessary and appropriate with respect to litigation pending against certain of the Debtors and their officers, directors and shareholders in the Delaware Chancery Court (collectively, the "Delaware Litigation").¹

7. As stated in the Retention Application, GT represented debtors Deep Marine Holdings, Inc. and Deep Marine Technology Inc. in the Delaware Litigation prior to the Petition Date. During the course of this and other related representations involving the same entities, GT became well-versed in the facts and circumstances concerning the Delaware Litigation. For this and other reasons, the Debtors believed GT's representation was "necessary, essential and in the best interests of the Debtors' bankruptcy estates and their creditors" and sought, on an expedited basis, retention of GT as special counsel to the Debtors. Retention Application ¶ 23. In particular, the Debtors stated GT's assistance in the Adversary Proceeding (as defined below) would be "critical" for the Debtors. Retention Application ¶ 25.

8. Even prior to the filing of the Retention Application, bankruptcy counsel for the Debtors requested that GT provide urgent and necessary assistance with respect to the

¹ The Delaware Litigation is styled as *FLI Deep Marine LLC et al. v. Paul McKim et al. (including Deep Marine Holdings Inc. and Deep Marine Technology Inc.)*, Civil Action No. 5020-VCS, Delaware Chancery Court and *Deepwork Inc. v. Paul McKim et al. (including Deep Marine Holdings, Inc. and Deep Marine Technology Inc.)*, Civil Action No. 5032-VCS, Delaware Chancery Court.

Delaware Litigation, including a determination as to the effect of the bankruptcy on the existing litigation, preparing and filing a suggestion of bankruptcy, attending conferences with the Vice Chancellor for the Delaware Chancery Court, attention to the ability of the Debtors to recover certain costs and expense under its D&O insurance policy and responding to discovery requests and motions pending in the Delaware Litigation to preserve the automatic stay and to preserve the assets of the estate. With this, GT commenced representation of the Debtors and continued to perform services for the Debtors in connection therewith pending approval of the Retention Application.

9. On January 19, 2009, the Debtors initiated Adversary Proceeding No. 10-03026 (the “Adversary Proceeding”) seeking, among other things, a temporary restraining order, preliminary injunction and permanent injunction related to the Delaware Litigation.

10. At the request of Debtors’ counsel, GT responded to post-petition efforts by the Delaware Claimants to continue the Delaware Litigation despite the stay, and assisted Debtors’ counsel with respect to the Adversary Proceeding, which was designed to restrain the Delaware Claimants from conducting the Delaware Litigation pending the stay. [Adversary Proceeding Docket No. 16]. The TRO restrained plaintiffs in the Delaware Litigation from continuing to prosecute the Delaware Litigation and any other lawsuit arising out of the same facts and circumstances as the Delaware Litigation. TRO at 1. The Court held that each of the claims and causes of action asserted by the plaintiffs in the Delaware Litigation concerns either (i) a direct claim against the Debtors, which was precluded by the automatic stay or (ii) a claim that is patently or arguably owned by the Debtors’ estates for the recovery of alleged wrongdoing against the estates. TRO at 2. Thus, GT’s immediate action in the Adversary Proceeding not only protected assets of the Debtors’ estates through enforcement of the automatic stay but also

preserved for the benefit of *all* creditors any recoveries the Debtors' estates may have for any alleged wrongdoing by one or more of the defendants in the Delaware Litigation.

11. Immediately after the entry of the TRO by the Bankruptcy Court, GT, at the request of bankruptcy counsel for the Debtors, led the efforts to thwart the efforts by the plaintiffs in the Delaware Litigation to avoid the consequences of the TRO and attend conferences with both the this Court and the Chancery Court of Delaware to ensure that the assets of the estate were preserved and not needlessly dissipated in the prosecution of the Delaware Litigation.

12. The Retention Application was never heard. Instead, at the hearing held on March 4, 2010, the Debtors withdrew the Retention Application without prejudice. The Debtors never expressed dissatisfaction with GT's work and indeed were anxious for GT to assist them.

13. Notwithstanding the fact that the Debtors withdrew the Retention Application, GT continued to assist the Debtors at the Debtors' request. Throughout this process, the Debtors and their counsel have continued to assert that GT's work resulted in a substantial contribution in the Cases. This has included extensive work to obtain, copy, index, sort and produce the records and documents that are germane to the Delaware Litigation and the investigation conducted by GT on behalf of the Special Litigation Committee. Such work was conducted at the specific request of the bankruptcy counsel for the Debtors.

14. On June 2, 2010, the Court entered *Order Confirming Debtors' Joint Plan of Reorganization And Approving Sale Of Substantially All Assets* [Docket No. 516].

III.
RELIEF REQUESTED

15. Pursuant to sections 503(b)(1)(A) and 503(b)(3)(D) of the Bankruptcy Code, GT seeks an order allowing as an administrative expense, in making a substantial contribution in the Cases and for actual, necessary costs and expenses of preserving the estates, compensation for professional fees in the amount of \$42,368.00, and reimbursement of expenses incurred in the amount of \$1,358.84, for a total of \$43,726.84. Copies of relevant invoices and time records are attached hereto as Exhibit A.

IV.
BASIS FOR REQUESTED RELIEF

A. GT Made Substantial Contribution In Cases

16. Section 503(b)(3)(D) of the Bankruptcy Code provides that compensable administrative expenses include “the actual, necessary expenses . . . incurred by . . . a creditor . . . in making a substantial contribution in a case under chapter 9 or 11 of this title”. 11 U.S.C. § 503(b)(3)(D). Although the Bankruptcy Code does not define the phrase “substantial contribution,” the Fifth Circuit has held the phrase to mean “a contribution that is ‘considerable in amount, value or worth.’” *Hall Financial Group, Inc. v. DP Partners, Ltd. Partnership (In re DP Partners Ltd. Partnership)*, 106 F.3d 667, 673 (5th Cir. 1997) (quoting Webster’s Third New International Dictionary 2280 (4th Ed. 1976)). “Generally, services which make a substantial contribution are those which ‘foster and enhance, rather than retard or interrupt the progress of reorganization.’” *Id.* at 672 (quoting *In re Consolidated Bancshares, Inc.*, 785 F.2d 1249, 1253 (5th Cir. 1986)). Further, “a creditor’s motives in taking actions that benefit the estate has little relevance in the determination whether the creditor has incurred actual and necessary expenses in making a substantial contribution to the case.” *Id.* at 673.

17. While the Fifth Circuit declined to develop a more concrete standard, noting that was best left on a case-by-case basis, it did create a baseline cost-benefit analysis for making a substantial contribution determination:

At a minimum, however, the court should weigh the cost of the claimed fees and expenses against the benefits conferred upon the estate which flow directly from those actions. Benefits flowing to only a portion of the estate or to limited classes of creditors are necessarily diminished in weight.

Id.; see also *In re Eldercare Home Health & Hospice*, 2007 WL 527943, at *2 (Bankr. S.D. Tex. 2007). In addition to the cost-benefit analysis set forth by the Fifth Circuit, this Court has employed certain factors to aid in determining whether a substantial contribution has been made, including:

- ‘(1) whether the services were rendered solely to benefit the client or to benefit all parties to the case;
- (2) whether the services provided a direct, significant, and demonstrable benefit to the estate; and
- (3) whether the services were duplicative of services rendered by attorneys [for other parties].’

Eldercare Home, 2007 WL 527943, at *2 (quoting *In re Buttes Gas & Oil Co.*, 112 B.R. 191, 194 (Bankr. S.D. Tex. 1989).

18. Under the Fifth Circuit’s baseline cost-benefit analysis and this Court’s factor test, GT’s services resulted in a substantial contribution in the Cases. GT’s request for fees and expenses totals only \$43,726.84. This amount is substantially outweighed by the benefits conferred upon the Debtors’ estates by GT’s services. Further, the benefits from GT’s services flowed to the entire creditor constituency and provided a direct, significant and demonstrable benefit to the Debtors’ estates. Finally, GT’s services were not duplicative of services rendered by attorneys for other parties.

19. Even after the Petition Date, the plaintiffs in the Delaware Litigation continued to litigate those cases. Continuation of the Delaware Litigation at such a critical, early juncture in the Cases when the Debtors' resources were extremely limited and could have exposed the Debtors, their estates and their creditors to considerable cost and delay, would likely have proved overwhelming and impeded the Debtors' reorganization efforts. Moreover, continuation of the Delaware Litigation would likely have resulted in irreparable harm to the rights of the Debtors in estate property, and value to the estates and their creditors would likely have been severely diminished. GT's immediate services with respect to the Delaware Litigation and, in particular, the Adversary Proceeding, both halted the continuation of the Delaware Litigation and allowed for the preservation of potential claims and causes of action owned by the Debtors' estates for the benefit of all creditors. Thus, GT's services, which were not duplicative of services rendered by attorneys for other parties in the Cases, ensured the protection of the rights of all creditors (by allowing the Debtors the opportunity to preserve, protect and maximize assets of the estates) and furthered the intent of the Bankruptcy Code by affording the Debtors the breathing spell they needed to properly focus on reorganization.

20. GT is an unsecured creditor of the Debtors (by virtue of its prepetition claim stemming from services provided to the Debtors related to the Delaware Litigation and the Texas Litigation) and is therefore entitled to assert an administrative claim for substantial contribution pursuant to section 503(b)(3)(D).

B. GT Incurred Actual, Necessary Costs And Expenses Of Preserving Debtors' Estates

21. Section 503(b)(1)(A) of the Bankruptcy Code provides "there shall be allowed administrative expenses . . . the actual, necessary costs and expenses of preserving the estate". 11 U.S.C. § 503(b)(1)(A). This provision requires a court to scrutinize claimed

expenses for waste and duplication to ensure expenses are actual and necessary. *DP Partners*, 106 F.3d at 673.

22. For the reasons stated herein, GT has performed services and incurred actual, necessary costs and expenses of preserving the Debtors' estates. GT's services were necessary for the protection of the rights of the Debtors and benefitted all creditors and other parties in interest in the Cases. Furthermore, GT's services were neither wasteful nor duplicative. Accordingly, even if the Court finds GT's services did not result in a substantial contribution to the Cases, the Court should allow GT's administrative expense claim as actual, necessary costs and expenses of preserving the Debtors' estates pursuant to section 503(b)(1)(A) of the Bankruptcy Code.

WHEREFORE, GT respectfully requests (i) entry of an order allowing an administrative expense claim on account of actual, necessary costs and expenses of preserving the estates, compensation for professional fees in the amount of \$42,368.00, and reimbursement of expenses incurred in the amount of \$1,358.84, for a total of \$43,726.84, and (ii) for such other and further relief as the Court deems just and proper.

Dated: July 15, 2010

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 15, 2010, a true and correct copy of the foregoing was electronically filed with the Clerk of the United States Bankruptcy Court for the Southern District of Texas, and was served on all parties on the attached master service list by electronic means as listed on the Court's ECF facilities, by electronic mail as indicated, and/or by United States first class mail, postage prepaid.

/s/ Shari L. Heyen

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